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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 FEDERAL TRADE COMMISSION,
19 Plaintiff,

20 v.

21 MICROSOFT CORP.,
and
22 ACTIVISION BLIZZARD, INC.

23 Defendants.
24
25
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Case No. 3:23-cv-02880-JSC

**DECLARATION OF PAGE ROBINSON IN
SUPPORT OF DEFENDANT ACTIVISION
BLIZZARD, INC.'S STATEMENT IN
RESPONSE TO PLAINTIFF FEDERAL
TRADE COMMISSION'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED (Civil L.R. 79-5(f)) [ECF NO. 308]**

Judge: Hon. Jacqueline Scott Corley

1 I, Page Robinson, declare as follows:

2 1. I am a Senior Director of Litigation and Intellectual Property at Activision
3 Blizzard, Inc. (“Activision”). I submit this declaration in support of Activision’s Statement
4 in Response to Plaintiff Federal Trade Commission’s Administrative Motion to Consider
5 Whether Another Party’s Material Should be Sealed. In my role, I have personal
6 knowledge of Activision’s use and protection of non-public, highly sensitive, and
7 confidential business information, including the information at issue here.

8 2. I have personal knowledge of the facts set forth below, and I can and would
9 competently testify to such facts if called to do so.

10 3. I have reviewed and am familiar with the portions of the FTC’s Final
11 Proposed Findings of Fact and Conclusions of Law that Plaintiff filed under seal because
12 they contained information designated by Activision as “Confidential.” Such information
13 is identified in Plaintiff’s Administrative Motion to Consider Whether Another Party’s
14 Material Should be Sealed (ECF No. 308) (the “Administrative Motion”).

15 4. As set forth in the Statement in Response to the Administrative Motion, the
16 portions identified in Plaintiff’s Administrative Motion contain non-public and highly
17 sensitive information, including, but not limited to, information reflecting Activision’s
18 internal decision-making processes, strategic evaluation of forward-looking opportunities,
19 market share analyses, assessment of the competitive landscape, business partnerships,
20 terms of existing confidential agreements, revenue figures and projections, and internal
21 business strategy.

22 5. This information could be used to injure Activision if made publicly
23 available, and it would cause competitive harm to Activision if the above information was
24 publicly disclosed. For example, disclosure of this information would give Activision’s
25 competitors insight into Activision’s strategies, plans, and assessments regarding potential
26 opportunities, and those competitors may alter their strategic plans or offerings if they
27 knew Activision’s strategies and plans. Disclosure of this information would also harm
28

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from any other signatory to this document.

Dated: July 19, 2023

/s/ Caroline Van Ness
Caroline Van Ness